

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

|                               |   |                   |
|-------------------------------|---|-------------------|
| PAUL HILLS,                   | ) |                   |
|                               | ) |                   |
| Plaintiff,                    | ) |                   |
|                               | ) |                   |
|                               | ) |                   |
| v.                            | ) | No. 1:08-cv-3329  |
|                               | ) |                   |
| BAXTER HEALTHCARE CORP.,      | ) | Judge Joan Lefkow |
| BAXTER INTERNATIONAL INC. and | ) |                   |
| WYETH SUBSIDIARY ILLINOIS     | ) |                   |
| CORPORATION F/K/A SCIENTIFIC  | ) |                   |
| PROTEIN LABORATORIES,         | ) |                   |
|                               | ) |                   |
| Defendants.                   | ) |                   |

**NOTICE OF MOTION**

Defendants Baxter International Inc. and Baxter Healthcare Corporation (“Defendants”) hereby give notice of their Motion to Stay Proceedings Pending Transfer by the Judicial Panel on Multidistrict Litigation. Defendants shall appear before Judge Joan Lefkow in Courtroom 1925 on Thursday, June 19 at 9:30 in the morning, or as soon thereafter as can be heard for presentment of this motion, a copy of which is served upon you.

This the 12th day of June, 2008.

Respectfully submitted,

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/s/ Leslie M. Smith, P.C.  
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